

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND
5 POST OFFICE SQUARE, BOSTON, MA 02109-3912**

MEMORANDUM

DATE: December 2, 2015

SUBJ: Inspection Report: TSCA Section 402c ("RRP Rule") Compliance Inspection of:
Environmental Compliance Specialists, Inc. ("ECSI") at the Worksite at "Lofts at Mill West"
or "Mill West," at 195 McGregor Street, Manchester, New Hampshire and a Follow-up Office
Visit at the ECSI Office, in Kingston, NH

FROM: Molly Magoon, Environmental Protection Specialist/ Enforcement Officer *M. Magoon*
Alma Padilla, Senior Environmental Employee (EPA Grantee)/ Inspector *Alma Padilla*
EPA Region 1, Office of Environmental Stewardship (OES), Toxics and Pesticides Unit (TPU)

THRU: Sharon Hayes, Manager, TPU, OES

TO: File

I. General Information

Firm and Address:

A. Environmental Compliance Specialists, Inc. (hereinafter "ECSI")
111 Route 125,
Kingston, NH 03848

B. Location of Inspection:

1. RRP worksite inspection on May 12, 2015 at:
Lofts at Mill West (hereinafter "Mill West")
195 McGregor Street
Manchester, NH 03101
2. RRP follow-up office visit on June 3, 2015 at:
ECSI Office
111 Route 125,
Kingston, NH 03848

C. Date of Inspection and Follow-up Office Visit:

- On 5/12/15: TSCA 402(c) (RRP) worksite inspection at Brady Sullivan's Mill West property/worksite, Manchester, NH; and
- On 6/3/15: follow-up office visit at ECSI office, Kingston, NH

D. Personnel Participating in Inspection on 5/12/15 (name, affiliation, and title):

Molly Magoon, EPA Enforcement Officer/Inspector
Alma Padilla, EPA-SEE Grantee, Inspector
Scott Pellerin, EPA- Chelmsford Laboratory
Knatalie Vetter, NH DHHS, Inspector

Ross Malcolm, NH DHHS, Inspector
Philip Alexakos, City of Manchester Health Department, Inspector
Gabriel Porter, US DOL-OSHA (OSHA), Safety and Occupational Health Specialist
Marc Pinard, Esq., Brady Sullivan, General Counsel
Jesse Wright, CEO/Founder, ECSI
Joldie Battista, ECSI, Site Supervisor

Personnel Present at Follow-up Visit on 6/3/15 at ECSI Office:

Molly Magoon, EPA Enforcement Officer/Inspector
Alma Padilla, EPA-SEE Grantee, Inspector
Jesse Wright, CEO/Founder, ECSI
Chris Wright, ECSI, General Manager
Carol Wright, ECSI, President
Chris Marky, ECSI staff

II. Purpose of Inspection and Background Information

- A. How Firm Was Selected/ Objectives of Inspection: Tip referrals from both the NH DHHS and the City of Manchester Health Department, plus several complaints were received from residents of Mill West.
- B. Background Information on Firm: Numerous previous inspections of related business, Brady Sullivan, by EPA for lead disclosure and RRP compliance at this and other properties and worksites. There are no previous TSCA Lead inspections of ECSI on record.
- C. Account of Pre-Inspection Communications with Firm: There was no prior contact made with ECSI prior to the EPA inspectors' arrival at the worksite. General Contractor is Brady Sullivan. Subcontractor is ECSI of 111 Route 125, Kingston, NH 03848; mailing address: POB 1147, Atkinson, NH 03811. City of Manchester and the NH DHHS personnel may have contacted both ECSI and Brady Sullivan prior to their arrival on May 12, 2015. US DOL - OSHA inspector also inspected this worksite for OSHA compliance.

III. 5/12/15: Worksite Inspection Time and Paperwork

- A. Start Time: 2:00 pm
- B. End Time: 5:30 pm
- C. EPA Inspector Credential Presented: Yes, to the following company representative(s):
Name: Jesse Wright, CEO, ECSI, company acting as Subcontractor to Brady Sullivan;
Name: Marc Pinard, Esquire, for Brady Sullivan acting as General Contractor
- D. Forms:
(See Attachments 1, 2 and 3: signed *NOI*, *CBI*, and *Receipt for Documents* forms); Document description follows:

1. *Notice of RRP Inspection* ("NOI") Form: Yes, signed by Jesse Wright with his handwritten comments added on the form (See Attachment 1).
2. *TSCA Confidentiality* ("CBF") Form: Yes, signed (See Attachment 2).
3. *Receipt for Documents* Form: Yes, signed by Jesse Wright during the follow-up office visit on June 3, 2015; no documents were collected during the worksite inspection, (See Attachment 3).

IV. **Business Operations**

When was entity established? ECSI was established in 1997 in NH.

What services are provided? According to their website: "ECSI is a family owned and operated company, serving New England in environmental remediation and demolition with nearly 20 years in the industry. ECSI specializes in asbestos abatement, lead paint removal, PCB removal, mold remediation and general demolition."

EPA focused their inspection on the work that ECSI was doing at Brady Sullivan's Mill West property. Prior to and on May 12, 2015, ECSI was working, conducting sandblasting of paint off walls, in vacant areas on the 1st and 2nd floors of the Mill West building. Mill West was being renovated under a City of Manchester permit issued to Brady Sullivan to rehab vacant, once commercial, areas of the old mill building into residential target housing units. Earlier at a separate inspection, also on June 3, 2015, at Brady Sullivan's Mill West, Marc Pinard stated to Inspectors Magoon and Padilla that the work on Mill West was in three phases and it is now in Phase 3. Marc Pinard gave the description of the work being done in Phase 3 as: work involves renovation and redevelopment into 98 target housing units on 1st and 2nd floors, 12 in the lower level, owned by Brady Sullivan Millworks IV, LLC (timeframe of work: started sandblasting 1st and 2nd floors May 2015 with permit issued to Brady Sullivan for converting portion of property into 110 residential units) (see Attachment 4: Copy of Building Permit issued to Brady Sullivan, dated April 21, 2015). ECSI has been involved with at least the work on the last phase as described by Marc Pinard and may have done work prior to Phase 3.

ECSI may be working on other construction projects, but the focus of the EPA inspection and follow-up was only on their work at the Brady Sullivan owned property, Mill West, in Manchester, NH.

Number of other Brady Sullivan properties that ECSI is working or may have worked on recently:

- NH – 1 TH property with ~ 98 units and 110 more units planned:
 - 1). Mill West, Manchester, NH - partially renovated mill building (b. 1889-1891) (presently 98 units; w/ an additional 110 units to be constructed);
- MA – 2 TH properties with ~575 units under construction:
 - 1). Lancaster Mill, Clinton, MA (b. 1844) - renovated mill building with ~ 132 units, Phase 2 about to start; and
 - 2). Pacific Mills, Lawrence, MA (b. 1889-90) conversion project from its former commercial use to target housing units that is currently being worked on by ECSI (Projected # of units: 345); and
- RI – 1 TH property with ~190 units (some are under construction):
 - 1). American Tourister Mill, Warren, RI (b. 1896) under construction: conversion project from commercial into target housing (~ 190 units);

V. RRP Rule Inspection:

- A. Certification: Had entity heard of the RRP Rule? Yes; How? General Contractor Brady Sullivan was informed about EPA's RRP Rule and Lead Disclosure Rule during previous EPA inspections: on August 22, 2012 (RRP and 1018), based on complaints regarding issues at another Brady Sullivan property (300 Bedford St., Manchester, NH) and on January 29, 2014 (RRP only), for complaints about the commercial facility, "Extra Space Storage," which was a commercial tenant at the Brady Sullivan property Mill West. Brady Sullivan's subcontractor, ECSI of their own accord, is in the construction/demolition business and among other things does "lead paint removal." ECSI was first RRP Firm Certified in 2010 and then again in 2015. So, the answer is yes, ECSI knew about the RRP Rule.

Did entity have EPA RRP Firm Certification? No, not at worksite; ECSI did not have their EPA RRP Firm Certificate onsite during the worksite visit. ECSI's first RRP Firm Certification recently expired on June 2, 2015. ECSI provided a copy of their RRP firm certificate later during a follow-up office visit to their office on June 3, 2015 (See Attachment 5). ECSI's firm certification was confirmed online: RRP Certified Firm Certificate #: NAT-51986-1, expired on June 2, 2015. ECSI reapplied for RRP firm certification. After the inspection and after the follow-up office visit, on June 12, 2015, ECSI sent EPA a copy of its newly acquired (second) RRP Firm certificate, Certification # NAT-51986-2, issued June 11, 2015, and due to expire on June 2, 2020 (See Attachment 6).

Did entity have Certified Renovators on staff? No; none of the officials of ECSI, nor any of their workers had RRP Individual Renovator certificates at the time of the worksite inspection or at the follow-up office visit. After the worksite inspection and after the follow-up office visit, ECSI provided 20 copies of newly acquired RRP Individual Renovator training certificates for 20 of their workers (See Attachment 7). All of the ECSI employees and a few company officials had taken and passed the EPA's "RRP Renovator Initial" course given by 1-4 A Better Environment, an EPA- approved RRP training provider, located in Concord, NH. All of the RRP individual renovator certificates issued to ECSI employees and officials are dated June 6, 2015.

- B. Recordkeeping: Does entity have a system of keeping records of RRP Compliance for subject jobs? No; Both ECSI and Brady Sullivan claimed that the sandblasting work was being done on the "commercial" part of the Mill West property and therefore, the work was not considered to be RRP work, but rather just an OSHA regulated "Lead in Construction" job. Jesse Wright of ECSI, claimed that Brady Sullivan never informed him or ECSI that the worksite area was being renovated into residential units. This contradicts what is stated on the building permit issued to Brady Sullivan (Copy of City of Manchester Building Permit, see Attachment 4).

- C. Did entity perform job subject to RRP Rule? Yes, more than 6 sq. ft. of interior painted surface was disturbed and the worksite that ECSI was sandblasting is being converted into target housing units.
- D. Was inspection a RRP...
1. Work practice inspection? Yes. EPA's RRP Checklist was completed by Inspector Magoon during the follow-up office visit on June 3, 2015 (See Attachment 8).
 2. Records inspection? No - not during the worksite inspection. No records were collected by EPA while at the Mill West worksite. Photos were taken during the May 12, 2015 worksite inspection and an accompanying photo log was completed (See Attachment 9).

A follow-up office visit was conducted on June 3, 2015 at ECSI's office in Kingston, NH, where EPA inspectors collected copies of a few documents. During the worksite inspection (on May 12, 2015), EPA inspectors were told by Jesse Wright of ECSI that there were no written contracts for any of the work done by ECSI for Brady Sullivan, not just at the Mill West property, but for any other work at any of the Brady Sullivan properties. Then during the follow-up office visit, a document was provided by Jesse Wright to the EPA inspectors titled: "Proposal," dated August 20, 2014, which describes proposed work by ECSI at Mill West (See Attachment 10). Jesse Wright explained that the proposal was submitted to Brady Sullivan, but Brady Sullivan never signed it and therefore a written contract does not exist for the work at Mill West, just a proposal for the work that they eventually started and subject of the EPA inspection.

VI. Compliance Assistance

What compliance assistance was provided? A copy of Region 1's Lead Compliance Assistance Outreach Packet with RRP Rule Compliance Assistance information was given to both Marc Pinard of Brady Sullivan and to Jesse Wright during the worksite inspection on May 12, 2015.

VII. Records Review:

- A. How many job records did the inspector review? No records except for a copy of the City Permit issued to Brady Sullivan for renovation work was collected. The permit was issued on April 21, 2015 to Brady Sullivan for construction of 110 residential "dwelling" units on ground and second floors.
- B. How were jobs were selected for review? Only the job involving renovations at Mill West due to several tenant complaints received. The investigation was not expanded to other properties. Marc Pinard stated during the inspection that there was not much in the way of recent RRP work done to the existing 98 residential units at Mill West, as the construction on the renovated units is new and work, if any, was minor.

- C. How many jobs have suggested potential non-compliance? At least one at the Mill West location; in Manchester, NH. Since the May 12, 2015 inspection, EPA has learned of other ongoing renovation work at other Brady Sullivan-owned mill/factory buildings being converted into residential units in Massachusetts and Rhode Island. ECSI is also involved with the sandblasting of another Brady Sullivan-owned property in RI undergoing conversion from commercial use to residential. The extent of ECSI's work at Massachusetts worksites is unknown. Enforcement of the RRP Rule is delegated to the states in both Massachusetts and Rhode Island. Inspector Magoon has informed the managers of the state lead programs in MA and RI of ECSI's possible involvement with other similar projects at other Brady Sullivan owned properties in their states.

VIII. Other Agencies Present during EPA's RRP Inspections at the Mill West Worksite

There are several other government agencies involved with the Mill West worksite. On May 11, 2015, the City of Manchester Building Department stopped the sandblasting work at the Mill West property due to the fact that it was not included in the building permit issued to Brady Sullivan. This action occurred after city officials went to the site and made observations due to receiving complaints from residents of the Mill West property. On the same day, EPA received a referral from the NH DHHS about the site and a complaint about the ongoing work at Mill West. The next day, on May 12, 2015, EPA inspectors Magoon, Padilla and Pellerin met at the Mill West site. Other agencies' representatives were also present:

- Phillip Alexakos of the City of Manchester, NH;
- Knatalie Vetter and Ross Malcolm, of the New Hampshire Department of Health and Human Services (NH DHHS, Concord, NH office; and
- Gabriel Porter, U.S. Department of Labor- Occupation Safety and Health Administration, Concord, NH office.

IX. Post Inspection Communications made with Company

After the inspection and after the follow-up visit, Inspector Magoon spoke with Mr. Jesse Wright about getting his workers signed up for RRP Individual Renovator training. Subsequently, ECSI has had all of their employees trained for RRP (as RRP Individual Renovators) and Inspector Magoon asked that copies of all of the certificates be sent to her. As mentioned previously, copies of the employees' RRP Renovator certificates, dated June 6, 2015 and a copy of ECSI's recently renewed RRP Firm certificate, dated June 11, 2015, were sent to Inspector Magoon from Chris Wright, General Manager of ECSI on June 12, 2015.

List of Attachments

1. Copy of signed *NOI* form, dated May 12, 2015;
2. Copy of signed *TSCA CBI* form, dated May 12, 2015;
3. Copy of signed *Receipt for Documents* form, dated June 3, 2015;
4. Copy of City of Manchester Building Permit issued to Brady Sullivan, dated April 21, 2015;
5. Copy of ECSI's first RRP Firm Certificate, issued by EPA Headquarters on May 19, 2010, expired on June 2, 2015;
6. Copy of ECSI's second, recently renewed RRP Firm Certificate; issued on June 11, 2015;
7. Copies of 20 ECSI employees' newly acquired RRP Individual Renovator certificates, dated June 6, 2015;
8. Copy of EPA's Region 1 RRP Inspection Checklist, completed during follow-up office visit on June 3, 2015 (one was not completed during the worksite inspection on May 12, 2015);
9. Copies of Photos taken by Inspector Magoon on May 12, 2015 and accompanying Photo Log; and
10. Copy of ECSI's "Proposal" for work at Brady Sullivan's Mill West, dated August 20, 2014.



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT
TITLE IV - LEAD HAZARD REDUCTION
NOTICE OF INSPECTION

RRP

1. INVESTIGATION IDENTIFICATION

DATE INSPECTION NO. DAILY SEQ. NO.

5/12/15 F16127 002

3. NAME & ADDRESS OF INSPECTED ENTITY

ECSI
POB 1147, Atkinson NH
03811

2. INSPECTOR'S ADDRESS

U. S. Environmental Protection Agency - New England
Five Post Office Square - Suite 100 (OES05-4)
Boston, MA 02109-3912

4. ADDRESS OF INSPECTION

195 McGregor St.
Manchester, NH 03102

For Internal EPA Use. Copies may be provided to recipient as acknowledgment of this notice.

RRP INSPECTION

For the purpose of monitoring compliance with the following Subparts of 40 CFR Part 745 Subpart E - Residential Property Renovation (check appropriate blocks):

- ☒ A. Information distribution requirements
☒ B. Work practice standards
☒ C. Recordkeeping and reporting requirements
☒ D. Firm certification
☒ E. Renovator certification and dust sampling technician certification
☐ F. Other

I, the undersigned, DOES NOT BELIEVE THAT THIS
PROJECT IS COVERED UNDER THE RRP RULE.
(PAINT REMOVAL)
THIS PROJECT IS BEING COMPLETED USING "LEAD IN CONSTRUCTION"
Guidelines

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

INSPECTOR'S SIGNATURE

M. Molly Magoon

RECIPIENT'S SIGNATURE

Jesse Wright

NAME

M. Molly Magoon

NAME

Jesse Wright

TITLE

Inspector

DATE SIGNED

5/12/15

TITLE

CEO

DATE SIGNED

5/12/15

FILE COPY



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460
TOXIC SUBSTANCES CONTROL ACT
TSCA INSPECTION CONFIDENTIALITY NOTICE

1. INVESTIGATION IDENTIFICATION

DATE 5/12/15 INSPECTOR NO. F16127 DAILY SEQ. NO. 002

4. FACILITY NAME

EC SI

2. INSPECTOR'S NAME

HOWY MAGOON

5. ADDRESS

PO BOX 1147
ATKINSON, NH 03811

3. INSPECTOR'S ADDRESS

U. S. Environmental Protection Agency - New England
Five Post Office Square - Suite 100 (OES05-4)
Boston, MA 02109-3912

6. NAME OF CHIEF EXECUTIVE OFFICER

JESSE WRIGHT

7. TITLE

CEO / FOUNDER

For internal EPA use. Copies may be provided to recipient as acknowledgment of this notice.

TO ASSERT A TSCA CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during the inspection of the facility cited above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR, Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the EPA Administrator determines that the data is entitled to confidential treatment, or may be withheld from release under other exceptions of FOIA.

Any or all information collected by EPA during the inspection may be claimed as confidential if it relates to trade secrets, commercial, or financial matters that you consider to be confidential business information (CBI). If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of CBI. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information claimed as CBI.

A CBI claim may be asserted at any time prior to or during the inspection. If a CBI claim is received after the inspection, EPA will make such efforts as are administratively practicable to protect the information. However, EPA cannot assure that such efforts will be effective in light of the possibility of prior disclosure. If it is more convenient for you to assert a CBI claim on your own stationary or by making the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this notice. The inspector will be glad to answer any questions you may have regarding EPA's CBI procedures.

While you may claim any collected information or sample as CBI, such claims are not likely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies), or by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).

3. The information is not publicly available elsewhere.

4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is CBI.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your company within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive CBI treatment.

The statement from the Chief Executive Officer should be addressed to:

Rosina Toscano
TSCA CBI Document Control Officer
USEPA-New England
5 Post Office Square - Suite 100 (OES05-1)
Boston, MA 02109-3912

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this notice. Claims may be made at any time after the inspection, but the inspection data will not be entered into the TSCA/CBI security system until an official confidentiality claim is made. The data will be handled under EPA's routine security system unless and until a claim is made. If no confidentiality claim accompanies the information when it is received by EPA, the information may be made available to the public without further notice to the business.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE
I acknowledge receipt of this notice:

If there is no one on the premise who is authorized to make CBI claims for this facility, a copy of this notice and other inspection materials will be sent to the company's Chief Executive Officer. If there is another official who should also receive this information, please designate below.

SIGNATURE

NAME

TITLE

NAME

TITLE

ADDRESS

DATE SIGNED

FILE COPY



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR DOCUMENTS

6/3/15 MM 1. INVESTIGATION IDENTIFICATION			2. COMPANY NAME
DATE 6/3/15	INSPECTION NO. F16127	DAILY SEQ. NO. 002	Environmental Compliance Specialists, Inc. ECSI
3. INSPECTOR ADDRESS U. S. Environmental Protection Agency - New England Five Post Office Square - Suite 100 (OES05-4) Boston, MA 02109-3912			4. COMPANY ADDRESS 111 Rte 125 Kingston, NH 03848

For internal EPA use. Copies of this form may be provided to recipient as acknowledgment of the documents mixtures described below collected in connection with the administration and enforcement of TSCA 402(c) and TSCA 406(b).

MM 6/3/15-002-

RECEIPT OF DOCUMENT(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
001	COPY OF ECSI's firm certification.
-002	COPY OF PROPOSAL FOR MILL WEST 1ST FLOOR PHASE 3 SANDBLASTING

OPTIONAL:

DUPLICATE COPIES: REQUESTED AND PROVIDED ☐

NOT REQUESTED ☒

INSPECTOR SIGNATURE

Molly Magoon

NAME

Molly Magoon

TITLE

Inspector

DATE SIGNED

6/3/15

CLAIMANT SIGNATURE

Jesse Wright

NAME

Jesse Wright

TITLE

Owner

DATE SIGNED

6/3/15

FILE COPY

6/3/15 MM



CITY OF MANCHESTER
PLANNING AND COMMUNITY DEVELOPMENT
BUILDING REGULATIONS DIVISION
 One City Hall Plaza, Manchester, New Hampshire 03101
 Phone: (603) 624-6450 Fax: (603) 624-6529
 E-Mail: pcd@manchesternh.gov www.manchesternh.gov

Leon L. LaFreniere, AICP
 Director

Pamela H. Goucher, AICP
 Deputy Director Planning & Zoning

Matthew M. Sink
 Deputy Director Building Regulations

PERMIT

Date 4/21/15

Application Number 15-00001140
 Property Address 195 MCGREGOR ST
 Map-Lot: TPK5 -0002
 Old Utility Account No.: 11613706000
 Tenant nbr, name 110 UNITS
 Application type description RESIDENTIAL-NEW, 5+ UNITS
 Property Zoning AMOSKEAG MILLYARD
 Application valuation 6500000

Owner

BRADY SULLIVAN MILLWORKS, LLC
 670 N COMMERCIAL ST
 MANCHESTER NH 03101

Contractor

BRADY SULLIVAN/JOHN REED
 670 N. COMMERCIAL ST STE 303
 JREED@BRADYSULLIVAN.COM
 MANCHESTER NH 03101
 (603) 851-4052

Permit BUILDING PERMIT
 Additional desc
 Permit Fee 65000.00 Plan Check Fee00
 Issue Date 4/21/15 Valuation 6500000
 Expiration Date 10/18/15

Qty	Unit Charge	Per	Extension
6500000.00	.0100	BLDG NEW-OTHER/ALT/RENOV.	65000.00

Special Notes and Comments

Construct 110 dwelling units on ground
 and second floors in accordance with
 SP-29-2010, PD-9-2010 and CU-22-2010, as
 per plans submitted, as per code.

Other Fees
 APPLIC FEE - BUILDING 25.00
 ARCHIVING FEE 156.00
 PLAN REVIEW FEE 2460.00

Fee summary	Charged	Paid	Credited	Due
Permit Fee Total	65000.00	65000.00	.00	.00
Plan Check Total	.00	.00	.00	.00
Other Fee Total	2641.00	2641.00	.00	.00
Grand Total	67641.00	67641.00	.00	.00

Leon L. LaFreniere

Director - Planning & Community Development

APR 21 2015

Date

CONTACT CUSTOMER SERVICE AT LEAST ONE DAY
 IN ADVANCE TO SCHEDULE AN INSPECTION.
 Appointments left by voicemail will not be accepted.

The Board of Assessors receives copies of all building
 permits issued and is authorized to inspect affected
 properties. A tax inspection may be scheduled by calling
 the Assessor's Office at (603) 624-6520.

United States Environmental Protection Agency



This is to certify that

Environmental Compliance Specialists Inc

has fulfilled the requirements of the Toxic Substances Control Act (TSCA) Section 402, and has received certification to conduct lead-based paint renovation, repair, and painting activities pursuant to 40 CFR Part 745.89

In the Jurisdiction of:

All EPA Administered States, Tribes, and Territories

This certification is valid from the date of issuance and expires June 2, 2015

NAT-51986-1

Certification #

May 19, 2010

Issued On

A handwritten signature in cursive script.

Michelle Price, Chief

Lead, Heavy Metals, and Inorganics Branch



United States Environmental Protection Agency

This is to certify that



Environmental Compliance Specialists, Inc.

has fulfilled the requirements of the Toxic Substances Control Act (TSCA) Section 402, and has received certification to conduct lead-based paint renovation, repair, and painting activities pursuant to 40 CFR Part 745.89

In the Jurisdiction of:

All EPA Administered States, Tribes, and Territories

This certification is valid from the date of issuance and expires June 02, 2020

NAT-51986-2

Certification #

June 11, 2015

Issued On

A handwritten signature in cursive script, appearing to read "Michelle Price".

Michelle Price, Chief

Lead, Heavy Metals, and Inorganics Branch

1-4 A BETTER ENVIRONMENT

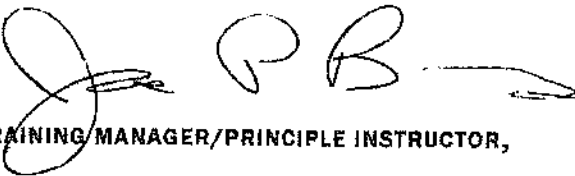
www.1-4ABE.com

54 Baileys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Freddy Ramos
111 Rt. 125 / Kingston, NH 03848

COURSE DATE:
6/5/2015
Examination Date:
6/5/2015
Expiration Date:
6/5/2020

x 
TRAINING/MANAGER/PRINCIPLE INSTRUCTOR,
6/5/2015 Date



1-4 A BETTER ENVIRONMENT

www.1-4ABE.com

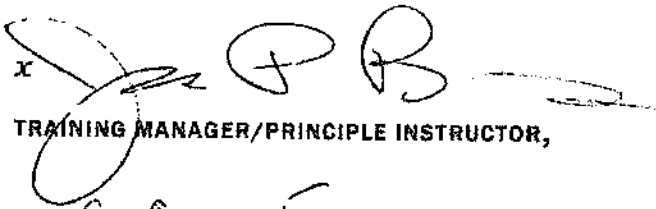
54 Baileys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Joldie Batista

137 Saratoga St. / Lawrence, MA 01841

COURSE DATE:
6/5/2015
Examination Date:
6/5/2015
Expiration Date:
6/5/2020

x 
TRAINING MANAGER/PRINCIPLE INSTRUCTOR,
6 Jun 15 Date



1-4 A BETTER ENVIRONMENT

www.1-4ABE.com

54 Baileys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Juan Ruiz Peña
27 Boehen St. / Lawrence, MA 01841

COURSE DATE:
6/5/2015
Examination Date:
6/5/2015
Expiration Date:
6/5/2020

x


TRAINING MANAGER/PRINCIPLE INSTRUCTOR,

6 Jun 15 Date



1-4 A BETTER ENVIRONMENT

www.1-4ABE.com

54 Baileys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Jovanny Batista

7-8 Melvin St. Apt. 14-10 / Lawrence, MA 01841

COURSE DATE:
6/5/2015
Examination Date:
6/5/2015
Expiration Date:
6/5/2020

x 
TRAINING MANAGER/PRINCIPLE INSTRUCTOR,

6 Jun 15 Date



1-4 A BETTER ENVIRONMENT

www.1-4ABE.com

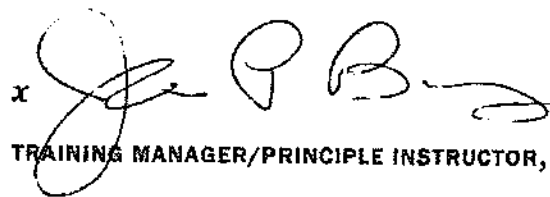
54 Balleys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Matt Rice

111 Rt. 125 / Kingston, NH 03848

COURSE DATE:
6/5/2015
Examination Date:
6/5/2015
Expiration Date:
6/5/2020

x 

TRAINING MANAGER/PRINCIPLE INSTRUCTOR,

6 Jun 15 Date



1-4 A BETTER ENVIRONMENT

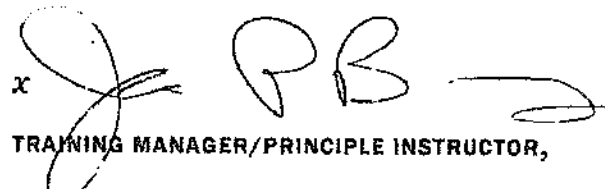
www.1-4ABE.com

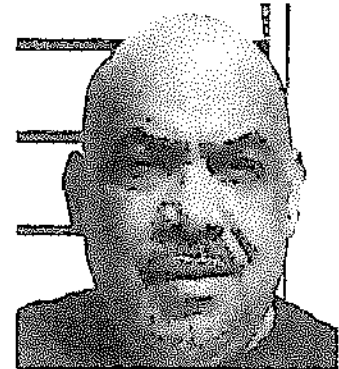
54 Baileys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Agapito Rodriguez
100 Boxford Street / Lawrence, MA 01841

COURSE DATE:
6/5/2015
Examination Date:
6/5/2015
Expiration Date:
6/5/2020

x 
TRAINING MANAGER/PRINCIPLE INSTRUCTOR,
6/5/2015 Date



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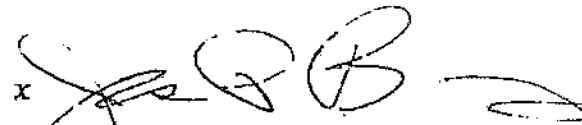
www.1-4ABE.com

54 Balleys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Marino Carpio
163 High Street / Lawrence, MA 01841

COURSE DATE:
6/5/2015
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6/5/2015
Expiration Date:
6/5/2020

x 
TRAINING MANAGER/PRINCIPLE INSTRUCTOR,
6 Jun 15 Date



1-4 A BETTER ENVIRONMENT

www.1-4ABE.com

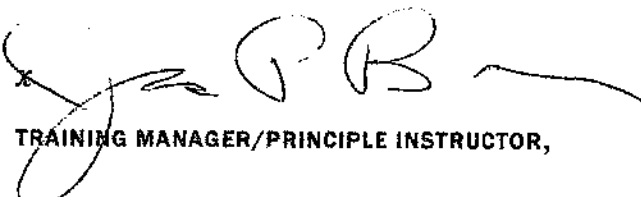
54 Balleys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Antonio Cruz

110 D Market St. / Lawrence, MA 01843

COURSE DATE:
6/5/2015
Examination Date:
6/5/2015
Expiration Date:
6/5/2020


TRAINING MANAGER/PRINCIPLE INSTRUCTOR,
6 JUN 15 Date



1-4 A BETTER ENVIRONMENT

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Renovator Initial - English
Per 40 CFR-Part 745.225

William Howarth

24 East Pleasant St. / Lawrence, MA 01841

COURSE DATE:
6/5/2015
Examination Date:
6/5/2015
Expiration Date:
6/5/2020

x


TRAINING MANAGER/PRINCIPLE INSTRUCTOR,

6 Jun 15 Date



1-4 A BETTER ENVIRONMENT

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54 Baileys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Javier Rodriguez

339 SR South Broadway / Lawrence, MA 01843

COURSE DATE:
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Examination Date:
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TRAINING MANAGER/PRINCIPLE INSTRUCTOR,
6 Jun 15 Date



1-4 A BETTER ENVIRONMENT

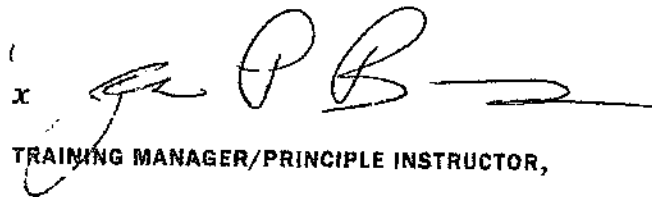
www.1-4ABE.com

54 Baileys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

José Guerra
14 Lexington St. / Lawrence, MA 01841

COURSE DATE:
6/5/2015
Examination Date:
6/5/2015
Expiration Date:
6/5/2020

x 
TRAINING MANAGER/PRINCIPLE INSTRUCTOR,

5 Jun 15 Date



1-4 A BETTER ENVIRONMENT

www.1-4ABE.com

54 Baileys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Nelson Santos

163 High St. / Lawrence, MA 01841

COURSE DATE:
6/5/2015
Examination Date:
6/5/2015
Expiration Date:
6/5/2020

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TRAINING MANAGER/PRINCIPLE INSTRUCTOR,

6 JUN 15 Date



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54 Baileys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Kelvin Barrera
13 Granite St. #11 / Methuen, MA 01844



x 
TRAINING MANAGER/PRINCIPLE INSTRUCTOR,
6 JUN 15 Date



1-4 A BETTER ENVIRONMENT

www.1-4ABE.com

54 Baileys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Yeysson Frias

P.O. Box 271 / Salem, NH 03079

COURSE DATE:
6/5/2015
Examination Date:
6/5/2015
Expiration Date:
6/5/2020

x

TRAINING MANAGER/PRINCIPLE INSTRUCTOR,

G. J. J. J. Date



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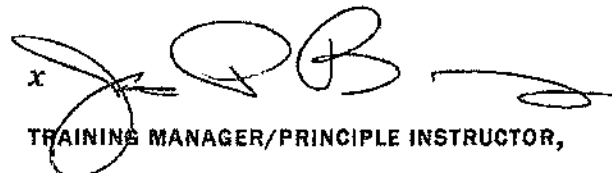
www.1-4ABE.com

54 Baileys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Justin Wright
7 Patriot Dr. / E. Hampstead, NH 03826

COURSE DATE:
6/5/2015
Examination Date:
6/5/2015
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TRAINING MANAGER/PRINCIPLE INSTRUCTOR,
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54 Balleys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Yuny Guerra
111 Rt. 125 / Kingston, NH 03848

COURSE DATE:
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Elvin Guerra
111 Rt. 125 / Kingston, NH 03848

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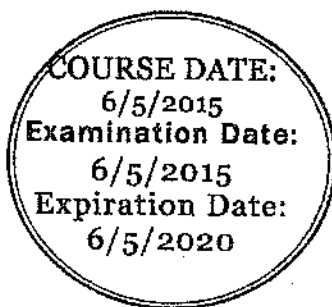
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Renovator Initial - English
Per 40 CFR-Part 745.225

Ricardo Cornejo
67 Berkely St. / Lawrence, MA 01841



x 
TRAINING MANAGER/PRINCIPLE INSTRUCTOR,

6 JUN 15 Date



1-4 A BETTER ENVIRONMENT

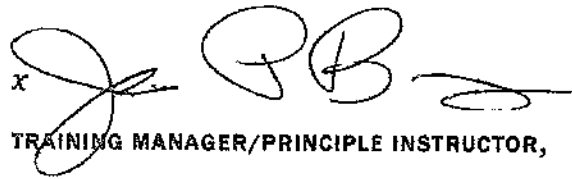
www.1-4ABE.com

54 Balleys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

Carlos Guerra
174 Jackson St. / Lawrence, MA 01841

COURSE DATE:
6/5/2015
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Expiration Date:
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TRAINING MANAGER/PRINCIPLE INSTRUCTOR,

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www.1-4ABE.com

54 Baileys Landing, Concord, NH 03303 (603) 753-0070 /c (603) 731-3895

Renovator Initial - English
Per 40 CFR-Part 745.225

German Arreaga
14 Willoughby St. / Lawrence, MA 01841

COURSE DATE:
6/5/2015
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6/5/2015
Expiration Date:
6/5/2020

x 
TRAINING MANAGER/PRINCIPLE INSTRUCTOR,

6 Jun 15 Date



76/3/2015^{MM} Follow-up to May 12, 2015
EPA Region 1 RRP Inspection Checklist—FIRM OFFICE/RECORD REVIEW

Inspection Date: <u>6/4/2015</u>		Inspection Number: <u>002</u>	
A1. EPA INSPECTORS		Inspector Name(s)	Inspector Credentials Presented
1 (Author)	<u>M. Magon</u>	<u>EPA</u>	Yes / To: <input checked="" type="checkbox"/> <u>Jesse Wright, CEO</u>
2			Yes / To: <input checked="" type="checkbox"/> <u>Chris Wright, GM</u>
3			Yes / To:
A2. OTHER INSPECTORS		Inspector Name(s)	Agency
1	<u>Alma Padilla</u>	<input checked="" type="checkbox"/> <u>EPA-SEE</u>	
2			
B. PRELIMINARY INFORMATION			
<u>Inspection Type</u>		<u>Office, Recordkeeping</u>	
<u>Facility Type</u>		<u>RRP / Partial Demolition.</u>	
<u>Entry</u>		<input checked="" type="checkbox"/> <u>1:30 pm 6/4/15</u>	
<u>Time of Arrival</u>		<u>" "</u>	
<u>Time of Departure</u>		<u>3:15 pm "</u>	
<u>NOI</u>		See Attachment # of Inspection Report	Signed by <input checked="" type="checkbox"/> <u>Jesse Wright</u>
<u>CBI Form</u>		See Attachment # of Inspection Report	Signed by <input checked="" type="checkbox"/> <u>" "</u>
<u>Receipt for Documents</u>		See Attachment # of Inspection Report	Signed by <input checked="" type="checkbox"/> <u>" "</u>
<u>Business operation continuing?</u>		<input checked="" type="checkbox"/> <u>yes</u>	
<u>Business registered with state?</u>		<input checked="" type="checkbox"/> <u>MA Corp./Incorporated in NH</u>	
C. FACILITY INFORMATION			
<u>Firm name and address</u>		<u>Environmental Compliance Specialists Inc.</u>	
<u>Information about Facility</u> (home office, commercial office, building manager office, other.)		<u>Family run / asbestos Lead abatement renovations demolition</u>	
<u>Notes:</u>			
<u>TCLP - waste @ BS & will send manifest Results.</u> <u>*(never rec'd by MM)* post-inspection note</u>			

D. FIRM / RENOVATOR POINTS OF CONTACT		Notes
<u>Owner / Landlord / Building Manager</u>	Carol Wright Owner →	ECST.
<u>Firm Certificate Number / Expiration date</u>	Collected Firm Cert.	NAT - 51986-1, Issued 5/19/10; Expired 6/2/15
<u>Certified Renovator(s)</u>	?? → everyone has lapsed.	none no one certified

E. TYPES OF RENOVATIONS PERFORMED OR OFFERED TO PERFORM	
<input type="checkbox"/> <u>Surface preparation and painting</u>	<input type="checkbox"/> <u>Weatherization</u>
<input type="checkbox"/> <u>Window / door replacement</u>	<input type="checkbox"/> <u>Building additions, modification, or rehabilitation</u>
<input type="checkbox"/> <u>Siding installation / replacement</u>	<input type="checkbox"/> <u>Demolition or partial demolition</u>
<input type="checkbox"/> <u>Roofing / gutters</u>	<input type="checkbox"/> <u>Conversion to Target Housing</u>
<input type="checkbox"/> <u>Other disturbance of painted surfaces incidental to utility installation, repair, or modernization</u>	

NOTES:
collected copy Proposal for Mill west. Never signed by Brady Sullivan, only by ECST.

HEPA ^{is} to Industrial Vacuum & Dust Collector. ^{Cleans sand after blasting.} ^{creates negative pressure.}

F. TYPES OF EQUIPMENT, TOOLS, AND PRACTICES SUPPLIED OR USED BY FIRM OR SUBCONTRACTORS

HEPA system vacuum <i>only after initial sand blasting</i>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	Crowbars / prybars	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	Waste chute with covers <i>Dumpsters</i>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA <input type="checkbox"/>
Power sanders/grinders with HEPA system attachment <i>Sand blasting</i>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	Reciprocal saw (Sawzall)	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	Dumpster or other heavy duty waste container	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Scrapers <i>no HEPA attached</i>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	Pressure washer	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	<input type="checkbox"/> Other: _____	

NOTES:

Prohibited Practices

Torches or open flame <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>	Other high speed mechanical means <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>
Sanders / grinders without HEPA system attachment <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	Heat gun at $\geq 1100^{\circ}\text{F}$ <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>
Stripping with non-approved chemicals <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>		

NOTES:

While Sand blasting - workers in ^{SCOR}safety. after. Monitor air / personal Monitoring - respirators.

G. RETAINED RECORDS

Certified Firm Retained Records (include document or attachment numbers for all records)

Lead test results

YES ☐ | NO ☒ | NA ☐

Doc. or att. #:

assumed lead. no test.

Certified Renovator assigned to project

YES ☐ | NO ☒ | NA ☐

Doc. or att. #:

Signed/dated acknowledgments of Renovate Right pamphlet

YES ☐ | NO ☒ | NA ☐

Doc. or att. #:

Copy of Certified Renovator's training certificate

YES ☐ | NO ☒ | NA ☐

Doc. or att. #:

Certifications of attempted mailing or hand delivery

YES ☐ | NO ☒ | NA ☐

Doc. or att. #:

Certified Renovator trained and directed uncertified workers

YES ☐ | NO ☒ | NA ☐

Doc. or att. #:

Records of notification activities for common areas and child-occupied facilities

YES ☐ | NO ☒ | NA ☐ Doc. or att. #:

Certified Renovator performed post-renovation cleaning verification

YES ☐ | NO ☐ | NA ☒

Doc. or att. #:

not done yet

If emergency existed, documentation of nature of emergency and steps taken outside the Rule

YES ☐ | NO ☐ | NA ☐

Doc. or att. #:

Record of dust clearance sampling where performed in lieu of cleaning verification

YES ☐ | NO ☐ | NA ☒

Doc. or att. #:

not done yet

NA X

NOTES:

Jesse states they sealed off all windows → Chris not migration of dust & debris escaped; had Air monitoring → Visual monitors - looked for any dust.

None failed ↓
OSHA - 30 µg/cm³

Certified Renovator Prepared Records
(include document or attachment numbers for all records)

Non-certified worker training including topics and names for each worker
 YES ☐ | NO ☐ | NA ☐

Doc. or att. #: ☐ no-one RRP
 mm Done, certified

Waste contained on-site and during transport off-site
 YES ☐ | NO ☐ | NA ☐

Doc. or att. #: ☐ ?? TCLP results w/ Brady Sullivan

Documentation of warning sign placement
 YES ☐ | NO ☒ | NA ☐

Doc. or att. #: ☐ none - NO SIGNS PRESENT

Documentation of post-renovation cleaning process
 YES ☐ | NO ☐ | NA ☒

Doc. or att. #: ☐ Work NOT completed

Identify test kit brand, test location(s), and results of lead tests
 YES ☐ | NO ☐ | NA ☐

Doc. or att. #: ☐ none - no testing done - assumed

Record of Certified Renovator post-renovation cleaning verification
 YES ☐ | NO ☐ | NA ☒

Doc. or att. #: ☐ Work not completed.

Documentation of interior, exterior, and passageway containment procedures
 YES ☐ | NO ☐ | NA ☐

Doc. or att. #: ☐ none documented

Alternate record of dust clearance sampling done by others
 YES ☐ | NO ☐ | NA ☒

Doc. or att. #: ☐ Work not completed.

Documentation of exterior ground protection and vertical protection where used
 YES ☐ | NO ☐ | NA ☐

Doc. or att. #: ☐ Interior work - migrated out into

common areas/units **NOTES:**

Certified Firm post-renovation reports to owners, occupants, or other customers

Provide summary of RRP compliance along with cleaning verification or dust clearance sampling results at the earlier of invoice delivery or 30 days following job completion.
 YES ☐ | NO ☐ | NA ☒

Doc. or att. #: ☐ Work not completed

NOTES:

EPA Photo Log: Brady Sullivan/ECSI Worksite


Facility: Brady Sullivan/ Lofts at Mill West, Manchester, NH; Photos taken my EPA Inspector Magoon

Photo No.	Camera File No.	Date and Time taken	Description of Photo
1	IMG_0252.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: chipping paint (white) on wood panelling in Common Area
2	IMG_0253.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Green Painted floor with paint chip/debris (white) (w/beige trim on door and baseboard)
3	IMG4_0254.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Blurry
4	IMG_0255.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Rusty dust on green painted sairs and staircase siding (w/unpainted wooden handrail)
5	IMG_0256.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: White painted brick wall with uneven, chipping paint; and dust and paint chips on green painted floor and wall moulding (one white painted pipe in middle of photo)
6	IMG_0257.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Interior Window/window sill with debris and paint chips
7	IMG_0258.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Green painted interior floor and white painted brick wall with paint chips and debris
8	IMG_0259.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Window and window sill with dust and debris; dusty metal handrail
9	IMG_0260.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Green painted metal door; white painted brick wall; sandblasting debris on green painted metal floor (out of focus)
10	IMG_0261.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Interior, green painted door, brick staircase wall and pipe; black sandblasting dust on metal door and white-painted brick door entrance
11	IMG_0262.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: new piping fixture with dusty brass parts and dusty, red painted handle and fixture part
12	IMG_0263.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway/staircase outside worksite area: paint and dust debris on metal floor with pipe with dusty red attachment

EPA Photo Log: Brady Sullivan/ECSI Worksite

Facility: Brady Sullivan/ Lofts at Mill West, Manchester, NH; Photos taken by EPA Inspector Magoon

13	IMG_0264.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Entrance way (taken from Exterior: Chipping and Peeling paint on exterior door (some intact green paint (granit stair; door mat and balck metal handrail). Entrance on river side, nearest to Bridge Street/Bridge.
14	IMG_0265.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Entrance door: close-up of same door as one in previous photo (IMG_0264.jpg)
15	IMG_0266.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Close-up of black sand blasting debris and white paint debris at Bldg. entrance (close-up of same entrance way as in Photo IMG_0267.jpg)
16	IMG_0267.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Exterior of Worksite area; garage door (closed):
17	IMG_0268.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg.: Exterior metal staircase leading to green painted door near entrance loading dock and worksite area
18	IMG_0269.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Dusty Green painted, interior door and green-painted brick wall, dust satirs and wall/moulding; sandblasting debris on metal floor outside door (one green painted pipe)(near worksite area)
19	IMG_0270.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Interior, green painted brick wall and staircase; debris and reddish dust on satirs and moulding along staircase (located near worksite)
20	IMG_0271.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway/staircase outside worksite area: paint and dust and debris on floor; mixed with red dust (out of focus)
21	IMG_0272.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Out of Focus
22	IMG_0273.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway/stairs: Out of Focus
23	IMG_0274.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Interior hallway floor (green painted) with white brick painted walls with dust and debris on floor and mouldings (wall and red painted portion of pipe in corner)

A close-up photograph of a wooden surface, likely a floor or wall, featuring vertical wooden planks. The wood has a light tan or beige color with visible grain patterns. There are several small, irregular holes and marks on the surface, particularly on the central plank. A date stamp is visible in the bottom right corner.

05/12/2015

05/12/2015



05/12/2015



05/12/2015

05/12/2015





05/12/2015



05/12/2015





05/12/2015



05/12/2015



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05/12/2015

05/12/2015





05/12/2015

05/12/2015

05/12/2015

05/12/2015

05/12/2015

Asbestos
HazMat
Lead Paint



Environmental Compliance Specialists, Incorporated

"Where compliance builds confidence."

24 Hour Emergency Response
UST & Soils
Selective Demolition

~ PROPOSAL ~

Submitted To: Shane Brady Phone: 603-622-6223 Date: August 20, 2014
Company: Brady Sullivan Fax: 603-622-7342
Address: 670 N. Commercial Street Job Name: Mill West 1st floor Phs 3 sandblasting
City: Manchester Location: 690 McGregor Street Manchester, NH
State: NH ZIP: 03101 Contact: Shane Brady
Contact Phone: _____

ECSI is pleased to have the opportunity to submit a quote for the following services

Sandblast first floor level of Mill West including loading dock and bumpouts.

Area is +/- 50,000 sf and includes brick walls, beams & columns.

Window in this area are new and will need to be protected to insure no damage is done during sandblasting.

The entire area is to be gut demoed by others, prior to sandblasting.

Area will be placed under negative pressure to eliminate dust outside of the work area.

The floor above will be vacant and will be monitored by ECSI personel to insure proper dust control. Area air monitoring will be utilized to prove the air quality in adjoining areas.

After blasting all blasting debris will be vacuummed with an industiral vacuum and debris will be disposed of by ECSI.

Ares will be preped with expandable foam to prevent dust migrtion between floors & adjacen spaces.

All power and water requirements will be the responsibility of the G.C.

This proposal respectfully submitted by: **Jesse Wright**

All work will be completed in compliance with local, state and federal regulations.

WE PROPOSE hereby to furnish material and labor - complete in accordance with the above specifications, for the sum of:

One hundred twenty thousand dollars \$ \$95,000.00

Payment to be made as follows: **Progress Payments TBD**

Interest charges of 1.5% per month will be charged on all outstanding balances.

All material is guaranteed to be as specified. All work to be completed in a workmanlike manner according to standard practices. Any alteration or deviation from the above specifications involving extra costs will be executed only upon written orders and will become an extra charge over and above the quoted price. All agreements contingent upon strikes, accidents or delays beyond our control. Owner to carry fire, tornado and other necessary insurance. Owner agrees to pay all costs associated with collection. Our workers are fully covered by Workers Compensation Insurance.

The above quote may be withdrawn by us if not accepted within 90 days.

ACCEPTANCE: The above prices, specifications and conditions are satisfactory and are hereby accepted.

NOTE: If, after your acceptance of proposal and job is canceled for any reason, a fee of Three Hundred Dollars (\$300.00) will be charged, to cover costs incurred to Environmental Compliance Specialists, Incorporated.

ECSI is authorized to do the work as specified. Payment will be made as outlined above.

Jesse Wright

ECSI Authorized Signature

August 20, 2014

Date

Customer Authorized Signature

Date

Billing Address:
P.O. Box 1147
Atkinson, NH 03811

Tel: 603-642-9200

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